

August 26, 2020

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *In re SSA Bonds Antitrust Litigation*, Case No. 1:16-cv-3711-ER

Dear Judge Ramos:

Plaintiffs, HSBC, and Deutsche Bank write jointly in response to the Court's order to submit a status update as to the efforts to obtain from those settling defendants the reasonably available information to be used to effectuate the proposed notice plan. Dkt. No. 652, at 2. As a reminder, Plaintiffs understand they have already received all reasonably accessible contact information from the remaining settling defendant, Bank of America. Accordingly, Bank of America is not part of this submission.

HSBC Bank plc and HSBC Securities (USA) Inc. ("HSBC") state as follows: As HSBC's July 29 and August 12 status reports explained, due to work-from-home restrictions that were imposed in both the U.S. and U.K., the relevant HSBC personnel were unable to remotely obtain necessary data from Bloomberg to isolate SSA transactions, which could be used to identify available counterparty contact information that may be available in HSBC's internal sources. HSBC had asked Bloomberg representatives for assistance in both the U.K. and the U.S., and was working to obtain the data from Bloomberg.

HSBC has now received the requested data from Bloomberg, and upon receipt began working on extracting the needed counterparty information. HSBC also engaged KPMG to assist in this process. HSBC expects to be in a position to provide Plaintiffs with an anticipated production schedule for the counterparty information once KPMG's work concludes early next week. Counsel for HSBC held a call with Plaintiffs on August 25, during which counsel explained the current status of HSBC's efforts.

Plaintiffs respond to HSBC as follows: Plaintiffs appreciate HSBC's update, and expect to continue working with HSBC in the hopes of obtaining the complete data set as quickly as possible.

Deutsche Bank states as follows: Deutsche Bank is continuing to work diligently to identify any other sources of contact information for certain additional counterparties where contact information was not readily available within the transactional data sets already produced by Deutsche Bank. Deutsche Bank has made substantial progress on this effort already, and expects to conclude its productions in the next several weeks.

Plaintiffs respond to Deutsche Bank as follows: Plaintiffs appreciate Deutsche Bank's update, and expect to continue working with Deutsche Bank in the hopes of obtaining the complete data set as quickly as possible.

Respectfully submitted,

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